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## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

November 08, 2019

United States of America

v.

David J. Bradley, Clerk of Court

Case No. **4:19mj2121**

Julius Joachim Ohumole

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 12/5/2018 through 1/28/2019 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 18, U.S.C., Section 1344

Bank Fraud

Title 18, U.S.C., Section 1028A

Aggravated Identity Theft

Title 18, U.S.C., Section 371

Conspiracy to Commit Aggravated Identity Theft

This criminal complaint is based on these facts:

The facts establishing probable cause that Julius Joachim Ohumole committed the federal criminal offenses set out in this complaint are described in the affidavit of FBI Special Agent Alexander Rayas, which is attached hereto.

☒ Continued on the attached sheet.

Complainant's signature

Alexander Rayas, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

11/8/19

Judge's signature

City and state:

Houston, Texas

Peter Bray, United States Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**JULIUS JOACHIM OHUMOLE,**

**Defendant**

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**Case No.**

**Filed Under Seal**

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**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Alexander Rayas, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent of the Federal Bureau of Investigation in Houston, Texas. I have been employed with the FBI in this capacity since November 18, 2016. As a Special Agent with the FBI, I have investigated various financial crimes including money laundering, mail fraud, wire fraud, and embezzlement, along with other federal criminal violations. I am currently assigned to the Money Laundering and Financial Institution Fraud Squad in the Houston Division.

2. Prior to becoming a Special Agent with the FBI, I worked for the U.S. Department of the Treasury's Internal Revenue Service ("IRS"). During part of that time, I served as a tax examiner verifying certain tax filings and requiring documentation as to filers' claims. While with the IRS, I also served as an information technology specialist managing and troubleshooting technical issues. I hold a Bachelor of Science degree in business with a concentration in computer information systems. During my undergraduate studies, I completed

coursework in both accounting and finance. I also hold a master's degree in business administration.

### **PURPOSE OF AFFIDAVIT**

3. The purpose of this affidavit is to show there is probable cause that from on or about December 5, 2018, until on or about January 30, 2019, Julius Joachim Ohumole (OHUMOLE) engaged in bank fraud, aggravated identity theft and conspiracy to commit aggravated identity theft, in violation of Title 18 U.S.C. § 1344, 18 U.S.C. § 1028A and 18 U.S.C. § 371.

4. The statements in this affidavit are based on information obtained pursuant to subpoena returns, interviews of witnesses, conversations and meetings with other law enforcement officers, analysis of financial documents, and my experience and background as an FBI Special Agent. Since this affidavit is being submitted solely to establish probable cause for the requested criminal complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe OHUMOLE has violated 18 U.S.C. § 1344 (bank fraud), 18 U.S.C. § 1028A (aggravated identity theft) and 18 U.S.C. § 371 (conspiracy to commit aggravated identity theft) as described herein.

### **FACTS SUPPORTING PROBABLE CAUSE**

5. On August 28, 2019, FBI Houston opened an investigation into an unknown subject (UNSUB) after the FBI received information from Regions Bank (REGIONS), regarding an alleged fraud involving a reported loss amount of \$1,278,000 resulting from unauthorized wire transfers conducted by UNSUBs from two home equity line of credit (HELOC) accounts held by REGIONS customers. Specifically, REGIONS provided information

alleging that UNSUB(s) opened bank accounts utilizing fraudulent identities, impersonated actual REGIONS customers in order to gain access to such customers' home equity line of credit (HELOC) accounts, and conducted unauthorized transfers from such HELOC accounts. REGIONS is a financial institution, the accounts of which are insured by the Federal Deposit Insurance Corporation.

6. In the first instance, REGIONS customers, herein identified as "SS" and "CS", reported fraudulent activity after reviewing their HELOC statement and discovering two unauthorized wire transfers of \$273,000 and \$200,000. According to REGIONS, an UNSUB opened a business account in the name of Mars Constructions (MARS) at REGIONS and added another UNSUB purporting to be SS as a signor on the business account. This gave the UNSUB purporting to be SS access to the MARS account, as well as the HELOC belonging to SS and CS. UNSUB then transferred \$473,000 from the HELOC into the MARS account. Two wire transfers were then conducted from the MARS account to Hong Kong totaling \$473,000. SS and CS subsequently filed a Uniform Affidavit for Identity Theft and Fraud Claim for the \$473,000 loss.

7. In the second instance, REGIONS reported a customer, herein identified as "CH" had his HELOC compromised. According to REGIONS, an UNSUB opened a business account in the name of JMW Holt Constructions (JMW) at REGIONS and added another UNSUB purporting to be CH as a signor on the business account. This gave the UNSUB purporting to be CH access to the JMW account, as well as the HELOC belonging to CH. UNSUB transferred \$805,000 from the HELOC belonging to CH into the JMW account. Three wire transfers were then conducted from the JMW account to Taiwan and the United Arab Emirates totaling

\$804,500. CH told REGIONS he did not authorize anyone to transfer any funds from his HELOC account. Detailed narratives of both of the above fraud schemes are outlined below.

### **The Mars Account**

8. On 12/5/2018, an UNSUB (who has since been identified as OHUMOLE as described herein) used a California Driver License (CDL) with the name KENNETH DAVIS (DAVIS) to open the MARS business account. The account was opened at a REGIONS branch located at 7801 Louetta Road, Spring, TX 77379. OHUMOLE presented the CDL (number K7295774) and a credit card as identification during the account opening.

9. On 12/31/2018, OHUMOLE, purporting to be DAVIS, returned to the Louetta branch location with an UNSUB impersonating SS. OHUMOLE requested the UNSUB be added to the MARS account as an authorized signer. The UNSUB impersonating SS presented a Tennessee Driver License, number xxxx2116 (masked for protection) and verbally provided SS's social security number (SSN) to the branch manager. By portraying himself to be SS, the UNSUB gained access to SS's HELOC account. The signature card for MARS had a social security number that was confirmed by the Social Security Administration to belong to DAVIS.

10. On 01/04/2019, an UNSUB called the REGIONS contact center and spoke with a Priority Banking Agent (PBA) and inquired about SS's account. The UNSUB provided information to verify his identity as SS. The UNSUB asked about several deposits and wanted to know if they had posted to the account. The UNSUB asked the PBA for his last deposit amount, and was provided with the last three deposits on the account. When the UNSUB asked to transfer money from the HELOC, the PBA asked, "the one with \$480,000?" the UNSUB responded, "yes" and requested a transfer of \$274,000.00 from the HELOC to the MARS account. The PBA verified the MARS account and proceeded to complete the transfer.

11. On 01/04/2019, a wire transfer in the amount of \$273,000 was made from the MARS account to Standard Chartered Bank, New York as the intermediary bank. A wire transfer in the same amount then went to a bank account in Hong Kong in the name of Boomlay Trading Co Limited held by DBS Bank. The bank to bank information for the wire was noted as "drilling equipment payment."

12. On 01/08/2019, an UNSUB called the REGIONS contact center and spoke with a PBA and inquired about SS's HELOC account. The UNSUB provided information to verify his identity as SS and again requested a transfer to the MARS account. The PBA submitted the request in the same manner as provided above. On 01/08/2019, a wire transfer in the amount of \$200,000 was made from the MARS account to Standard Chartered Bank, New York as the intermediary bank. The wire then went to the same Boomlay Trading Co Limited account held by DBS Bank. The bank to bank information for the wire was again noted as "drilling equipment payment."

#### **The JMW Account**

13. On 12/11/2018, an UNSUB (who has since been identified as OHUMOLE as described herein) used a CDL with the name JAMES MERRELL WASHINGTON (WASHINGTON) to open the JMW business account. The account was opened at a REGIONS branch located at 2501 W. Main Street, League City, TX 77573. OHUMOLE presented the CDL (number K7295739) and a credit card as identification during the account opening.

14. On 01/18/2019, OHUMOLE, purporting to be WASHINGTON, returned to the League City branch with an UNSUB impersonating CH. OHUMOLE requested the UNSUB be added as an authorized signer on the JMW account. The UNSUB purporting to be CH presented a Florida Driver License, number xxxxxxxxx3050 (masked for protection) and verbally provided

CH's SSN to the bank, which granted the UNSUB impersonating CH access to CH's HELOC account. The signature card for JMW had a social security number that was confirmed by the Social Security Administration to belong to WASHINGTON.

15. On 01/22/2019, a transfer from CH's HELOC to the JMW account in the amount of \$480,000 was completed. On the same day, two wire transfers from the JMW account in the amounts of \$200,000 and \$279,800 were completed through Standard Chartered Bank; \$200,000 went to First Commercial Bank, 30 Chungking South Road, Taipei, Taiwan; and \$279,800 went to Emirates NBD Bank, Dubai, United Arab Emirates.

16. On 01/28/2019, a transfer from CH's HELOC to the JMW account in the amount of \$325,000 was completed. On the same day, a wire transfer from the JMW account in the amount of \$324,700 was completed through Standard Chartered Bank to Emirates NBD Bank, Dubai, United Arab Emirates.

17. CH confirmed to REGIONS he did not authorize the above transfers from his HELOC account.

#### **Additional Information**

18. An administrator of records at the Harris County Clerk's office provided the Assumed Name Records Certificate of Ownership for Unincorporated Business or Profession (ARC) for MARS and JMW. The owner for MARS was listed as DAVIS, and the owner for JMW was listed as WASHINGTON. Accompanying the ARCs were photos of the CDL presented for DAVIS and WASHINGTON at the time of filing. The CDL number for DAVIS was K7295774, and the CDL number for WASHINGTON was K7295739. These were the same CDLs presented to REGIONS at the time of account openings for MARS and JMW. The photos on both licenses were the same. Database checks conducted by the FBI Sacramento field office

using the CDL numbers above yielded negative results in the CDL database, indicating that both CDLs were fake.

19. Houston Police Department (HPD) and the Texas Department of Public Safety (DPS) were working a parallel investigation into an UNSUB who used CDLs and drivers licenses from Florida and Minnesota under different names to obtain ARCs for Unincorporated Business or Profession. Using DPS facial recognition software, HPD and DPS identified OHUMOLE as the best match for the photo on the driver's licenses. Upon inspection and comparison, I have determined that the photos on the DAVIS and WASHINGTON CDLs were in fact OHUMOLE. Therefore, the MARS and JMW accounts at REGIONS were opened utilizing fake identification documents. In my training and experience, this is done in order for UNSUBs to avoid detection and identification by banks and law enforcement when criminal activity is discovered.

20. RM, an assistant and leasing manager at an apartment complex where OHUMOLE resided was shown a REGIONS surveillance photo of the UNSUB purporting to be DAVIS. The apartment complex was 7 Seventy Apartments located at 770 N. Eldridge Parkway, Houston, TX 77079. RM confirmed it was OHUMOLE in the photo. RM was then shown OHUMOLE's actual Texas driver's license photo and she confirmed it to be OHUMOLE.

21. According to a Harris County marriage license, OHUMOLE married Davona Cherie Minor-Ohumole (MINOR) on July 16, 2019. MINOR provided the Texas Department of Public Safety Driver License Division with OHUMOLE as an emergency contact. MINOR's Facebook page, which is under the name Dede Minor, contains several pictures of her and OHUMOLE. The first photo of MINOR and OHUMOLE was dated 03/11/2019, and the most recent photo was dated 09/18/2019. A video of MINOR and OHUMOLE dancing together was




posted on 10/21/2019. I have compared photos posted on Facebook and photos provided by REGIONS, and they appear to be the same person.

### CONCLUSION

22. Based upon my training and experience, along with facial recognition software, interviews, social media research, and other investigative steps, I conclude the individual that opened the MARS and JMW accounts was in fact OHUMOLE and the purpose for opening the accounts was to receive proceeds from fraud. I further conclude OHUMOLE provided fake identification documents, social security numbers belonging to individuals other than OHUMOLE and UNSUBSs to open the accounts, and conspired with UNSUBs to use without lawful authority the means of identification of victims in furtherance of the bank fraud scheme; specifically their social security numbers, which meet the definition for a "means of identification" under Title 18 USC § 1028 (d)(7)

23. Based on the above, I respectfully submit that there is probable cause to believe that OHUMOLE has engaged in bank fraud in violation of 18 U.S.C. § 1344, 18 U.S.C. § 1028A (aggravated identity theft) and conspiracy to commit aggravated identity theft in violation of 18 U.S.C. §371.

  
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Alexander Rayas  
Special Agent  
Federal Bureau of Investigation

Sworn and subscribed before me this 8 day of Nov, 2019 in Houston, Texas, and I find probable cause.

  
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UNITED STATES MAGISTRATE JUDGE

**Sealed**  
Public and unofficial staff access  
to this instrument are  
prohibited by court order

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

*November 08, 2019*

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA §  
v. §  
JULIUS JOACHIM OHUMOLE §

CASE NO. **4:19mj2121**

**FILED UNDER SEAL**

MOTION TO SEAL COMPLAINT AND WARRANT

COMES NOW the United States of America ("Government"), by and through Ryan K. Patrick, United States Attorney for the Southern District of Texas, and the undersigned Assistant United States Attorney, and represents:

1. A Complaint was filed with this Court on November 8, 2019.
2. The Complaint charges defendant Julius Joachim Ohumole with committing bank fraud in violation of Section 1344 of Title 18, United States Code, aggravated identity theft in violation of Section 1028A of Title 18 United States Code, and conspiracy to commit aggravated identity theft in violation of Section 371 of Title 18 United States Code.

3 The Government hereby requests that this Court seal the Complaint and Arrest Warrant until such time as the defendant has been arrested. In support of this request, the Government would show that defendant will face significant prison time if convicted of the offenses alleged in the Complaint. Accordingly, the Government

seeks to arrest the defendant before any possibility that he may seek to avoid arrest.


4. The Government further requests that the Complaint and Arrest Warrant become automatically unsealed upon the arrest of the defendant.

5. Finally, the United States asks the Court to order the District Clerk to provide copies of the sealed Complaint and Arrest Warrant to the United States Attorney's Office and to FBI Special Agent Alexander Rayas.

WHEREFORE, PREMISES CONSIDERED, the Government prays that this Court seal the Complaint and Arrest Warrant until the defendant has been arrested, at which time, the Complaint and Arrest Warrant will be automatically unsealed without further order of this Court.

Respectfully submitted,

RYAN K. PATRICK  
United States Attorney

  
John R. Braddock

Assistant United States Attorney  
1000 Louisiana Street, Suite 2300  
Houston, Texas 77002  
Tel: (713) 567-9728